REMARKS

Claims 1-28 are pending in this application. By this Amendment, claims 1 and 23 are amended for cosmetic purposes only, and claims 26-28 are added. No new material is added. The amendments to claims 1 and 23 do not require a more narrow interpretation of claim scope, and Applicant does not disclaim any equivalent of any amended limitation. Reconsideration in view of the above amendments and the following remarks is respectfully requested.

The Office Action rejects claim 23-24 under 35 U.S.C. §102(e) over Benjamin (U.S. Patent No. 6,438,535); claim 25 is rejected under 35 U.S.C. §102(e) over Sharood (U.S. Patent No. 6,453,687); claims 1-22 are rejected under 35 U.S.C. §103(a) over Benjamin in view of Ladd; claim 4 is rejected under 35 U.S.C. §103(a) over Benjamin in view of Ladd and Liu (U.S. Patent No. 5,794,257); and claims 7 and 14 are rejected under 35 U.S.C. §103(a) over Benjamin in view of Ladd and Chen (U.S. Patent No. 5,504,674). These rejections are respectfully traversed.

Claims 23-24 are Directed to Patentable Subject Matter

Regarding claims 23-24, Applicant asserts that Benjamin does not teach or suggest a method for displaying a product manual for a particular product that includes gathering resources related to the product and its components and sub-components, organizing the information into sets of information, defining a unit object data structure to hold data related to a particular component, and using data from the unit data structure of an initial component to generate a graphical user interface corresponding to the unit data structure and presenting user-selectable links to sub-component unit data structures, as recited in independent claim 23.

Benjamin discloses a method for accessing information useful to the manufacture, repair

and maintenance of a particular system using a relational database. See, Abstract. In operation,

the Benjamin approach starts with data representing the construction of assemblies and sub-

assemblies into a relational database. See, col. 2, lines 51+. As described in Benjamin, the

database is limited to two types of information: lookup tables for repetitively used data, and

assembly specific tables unique for particular assemblies. See, col. 3, lines 1+, col. 4, lines 32+

and Figs. 1-3. Additionally, parts, locations and units are defined. See, col. 4, line 65-68 and

Fig. 4. However, Benjamin does not teach or suggest using data from unit data structure of an

initial component to generate a graphical user interface corresponding to the unit data structure

and presenting user-selectable links to sub-component unit data structures, as recited in

independent claim 23.

To the contrary, while Benjamin does disclose the use of a "graphical user interface" (col.

16, lines 29-30), nowhere does Benjamin suggest that any units from the unit definition process

(described much later at col. 19, lines 51+) are used to generate a graphical user interface

corresponding to any unit data structure. In fact, the basic process of Benjamin as summarily

described in col. 23, line 51 to col. 24, line 20 and Fig. 4 shows that while "drawings" can be

used to form location definitions, parts definitions and unit definitions, nowhere are the unit

definitions used to generate drawings.

Additionally, nowhere does Benjamin suggest that its drawings or any other graphic

contain user-selectable links to sub-component unit data structures, and the incidental mention

of an "event driven graphical user interface" does not suggest that Benjamin remotely even

appreciates graphically presented user selectable links to sub-component unit data structures.

Therefore, independent claim 23 is directed to patentable subject matter. Dependent claim

24 is directed to patentable subject matter by virtue of its dependency as well as for the additional

features it recite. Accordingly, Applicant respectfully requests withdrawal of the rejection under 35

U.S.C. §102.

Claims 25-28 are Directed to Patentable Subject Matter

Regarding claims 25-28, Applicant asserts that Sharood does not teach or suggest an

appliance that includes a plurality of subsystems, an electronic control system including a data

processor, an interface and <u>computer code devices executing on the data processor to cause the</u>

<u>processor to implement a graphical user interface displaying data obtained from the external</u>

<u>data sources</u>, as recited in independent claim 25.

Sharood discloses a building control (BC) system (see, Fig. 1) having a control server

(see, Fig. 2) that includes a processor, various types of memory and a variety of

communication devices. As stated on col. 5, lines 14-17, the control server "interfaces with

any of the systems graphic user interfaces (GUIs), PC networks, Internet, and all other portions

of the BC[.]" In order to reduce costs, the Sharood system is designed to work with everyday

appliances via an "appliance communication module and a retrofit plug" that allow such

appliances to communicate with the control server. See. col. 7, lines 25-36. However,

Sharood does not teach or suggest an appliance having <u>computer code devices executing on the</u>

<u>data processor to cause the processor to implement a graphical user interface displaying data</u>

<u>obtained from the external data sources</u>, as recited in independent claim 25.

To the contrary, despite the Office Action's assertion (page 4) concerning col. 9, line 56

to col. 10, line 8, Sharood discloses no appliance having any computer code or display

whatsoever, much less any appliance displaying data obtained from the external data sources.

Applicant points to the specific text at issue, reproduced below:

> **"The PLC coded signals are supplied by the retrofit plug** to the external power circuit that supplies power to the appliance. The control server 100 monitors the external power circuit to receive the PLC coded signals. In this way, the control server 100 can monitor appliances connected to the external power circuit and the appliances can exchange data with the control server 100 or other appliances connected to the network.
>
> The control server 100 or a remote monitoring service is able to perform diagnostic interpretation about the appliance 130. In this manner, the BC system can determine the health of the appliance, the appliance's current function (e.g., how many burners are on, oven capacity, temperature monitoring in a refrigerator, and washer and drier cycles including length), and device failure (including cause). For example, if a current signature or power usage for the light bulb in a refrigerator is detected as being active over an extended period of time, **the control server 100 can determine that an open door condition exists and can generate a message for display on an interface 150 to alert the user to shut the door."** {bolded emphasis added}

First, applicant points out that the term "PLC" in "PLC coded signals" does not refer to

any form of computer code, but instead refers to a POWER LINE COMMUNICATION

PROTOCOL. Additionally, as the last sentence in the quote above clearly states, a particular

interface 150, not any appliance, is used to display the open door message. The Interface 150,

reproduced below from Sharood, clearly shows interface 150 is not part of any appliance.
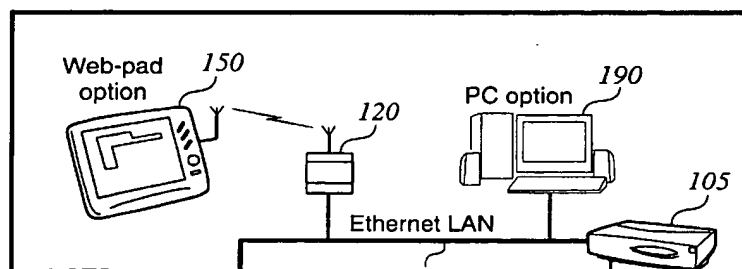
Thus, Sharood does not teach or suggest each and every limitation of claim 25.

Accordingly, independent claim 25 is directed to patentable subject matter. Dependent claims 26-

28 are directed to patentable subject matter by virtue of their dependency as well as for the

additional features they recite. Accordingly, Applicant respectfully requests withdrawal of the

rejection under 35 U.S.C. §102, and prompt consideration of claims 26-28 is requested..

Claims 1-22 are Directed to Patentable Subject Matter

Regarding claims 1-22, Applicant asserts that it would not have been obvious at the time

of the invention to modify Benjamin using the teachings of Ladd, Liu and Chen to teach or

suggest an electronic product manual comprising a plurality of data structures holding data

representing a product and having a hierarchical relationship as components and sub-components

with each other, and a graphical user interface (GUI) and a second view of the selected data

structure displayed in the GUI upon selection, the second view including information

indicating a hierarchical relationship of the selected data structure with respect to other data

structures, as recited in independent claim 1 and similarly recited in independent claim 12.

Benjamin describes the methods and systems discussed above. Benjamin does not teach

or suggest an electronic product manual having a graphical user interface (GUI) and a second

view of the selected data structure displayed in the GUI upon selection, the second view

including information indicating a hierarchical relationship of the selected data structure with

respect to other data structures, as recited in independent claims 1 and 12, an issue that the

Office Action concedes on pages 5 and 9.

Ladd discloses a computer-implemented system for developing product documentation.

See, Abstract. As shown in Fig. 2, the Ladd system is capable of displaying a tree-structure

representing an organization of projects. See also, col. 4, lines 6-15. However, Ladd does not

teach or suggest a product manual having a second view including information indicating a

hierarchical relationship of [a] selected data structure with respect to other data structures.

To the contrary, the Ladd disclosure specifically relied upon by the Office Action makes

no mention of any product manual with view that includes hierarchical relationships of

components and sub-components. To review this issue more closely, the relevant text

specifically cited by the Office Action is reproduced below:

> "For browsing purposes, the PDG contains a menu that displays the products and
> meta-products entered thus far. **If one of these is selected, it explodes into its
> respective product tree**. From here, one of the phase trees may be selected. From
> a phase tree, a deliverable can be selected by either single clicking (summary), or
> double clicking (detail). The summary browse gives a brief description of the
> deliverable, its completion status, and metrics. The detail browse opens the
> deliverable with whatever tool to which it is linked." {bolded emphasis added}

In reviewing the cited text above, Applicant first notes that the term "product tree"

appears nowhere else in the specification and is not expressly defined. However, a careful

review of the specification indicates that the term **"product tree"** refers to a **"product life cycle

tree"**, i.e., a collection of milestones, activities, deliverables and schedules necessary to complete

product development. See, col. 2, lines 27-36. Accordingly, Ladd does not teach or suggest a

view including relationships of data structures relating to components and subcomponents.

Thus, Ladd does not provide for the deficiencies of Benjamin.

Liu and Chen do not teach or suggest a hierarchical view including relationships of data

structures, nor does the Office action assert such. Thus, Liu and Chendoes not provide for the

deficiencies of Ladd and Benjamin.

Thus, the Office Action has not provided any *prima facie* case of obviousness. To

establish a *prima facie* case of obviousness, the prior art references must teach or suggest all the

claim limitations, and there must be some motivation, either in the references themselves or in the

knowledge generally available to one of ordinary skill in the art, to modify or combine the reference

teachings. See MPEP §2143, for example. **Both of these requirements must be met.**

As discussed above, the applied art of reference, individually or in combination, do not

teach or suggest all the claim limitations.

Furthermore, there is no motivation, either in the cited references themselves or in the

knowledge generally available to one of ordinary skill to modify Ladd using the teachings of Liu.

While the Office Action states on page 6 that "*it would have been obvious ... because it would*

provide for the purpose of enabling a user to have immediate access to the integrated

information, guidance, advice, assistance, training and other useful information about a product

from the data structures of Benjamin" this stated motivation is problematic for a number of

reasons.

First, **the stated motivation is taken out of its original context.** Referring to col. 3, lines

9+ (the source of the Office Action's quoted text above) the full text reads:

> "The PCC 24 is an information technology enabling a user to have immediate
> access to the integrated information, guidance, advice, assistance, training and
> tools **required to establish and develop a specific product based on a specific**
> **process.** The PCC 24 provides a model that stresses attention on **product**
> **development** by process adherence and seeks to **continuously improve the**
> **product development.** ... The goal is to provide flexible process definition and
> **product development guidance.**" {Bolded Emphasis Added}

A review of the specific text raised by the Office Action indicates that Ladd refers to reasons

for implementing a particular product development scheme, not any form of maintenance manual.

In fact, the terms "maintenance manual", "product manual" or any variant thereof do not even

appear in Ladd.

Second, given that Ladd is directed to organizing management processes related to product

development, as opposed to any process directly related to the formation or specification of a

product, it is unclear why anyone of ordinary skill in the art would wish to apply specific aspects of

a management life cycle tool to a maintenance manual.

Third, Applicant further points out that the actual text above is by no means a motivation to

modify another device using the teachings of Ladd, but in fact at best a motivation to use the

teachings of Ladd as they exists.

Applicant respectfully reminds the Examiner that as recently as January 2002 the Federal

Circuit rejected the argument that an assertion of obviousness can be merely based on a

generalized notion that a particular process is obvious, but affirmatively stated that a conclusion

of obviousness must be supported by documented evidence, and that such documented evidence

must include "some motivation, suggestion, or teaching of the desirability of making the **specific**

combination" {bolded emphasis added}. *In re Lee*, Case No. 00-1158 (Fed. Cir. 2002); *In re*

Fine, 837 F.2d 1071, 1075, 5 USPQ2d 1596, 1600 (Fed. Cir. 1988). General statements about

the desirability of a secondary reference, such as those provided by the Office Action in the

present circumstances, do not fulfill the obligation of the Patent Office to provide the required

motivation to modify a primary reference in a specific fashion based on the secondary reference.

Accordingly, there can be no *prima facie* case of obviousness to modify Benjamin based on the teachings of Ladd. Thus, independent claims 1 and 12 are directed to patentable subject matter. The dependent claims are directed to patentable subject matter by virtue of their dependency as well as for the additional features they recite. Accordingly, Applicant respectfully requests withdrawal of the rejections under 35 U.S.C. § 103(a).

Conclusion

Applicant respectfully solicits that this Application is in condition for allowance, and Applicant requests that the Examiner give the Application favorable consideration and permit it to issue as a patent. However, if the Examiner believes that the Application can be put in even better condition for allowance, the Examiner is invited to contact Applicant's representative listed below.
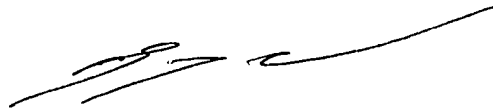
Please charge any shortage in fees due in connection with the filing of this paper, including

extension of time fees, to Deposit Account 502036 and please credit any excess fees to such deposit

account.

                                                    Respectfully submitted,

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